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STATE OF COLORADO

Roy Romer, Governor  
Patricia A. Nolan, MD, MPH, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

4300 Cherry Creek Dr. S. 222 S. 6th Street, Room 232  
Denver, Colorado 80222-1530 Grand Junction, Colorado 81501-2768  
Phone (303) 692-3300 Phone (303) 248-7164  
Fax (303) 759-5355 Fax (303) 248-7198

October 3, 1994

Mr. Steven W. Slaten  
U.S. Department of Energy  
Rocky Flats Plant  
Building 116  
P. O. Box 928  
Golden, Colorado 80402-0928

RE: OU-8 Phase I RFI/RI Work Plan Approval

Dear Mr. Slaten,

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division and the U. S. Environmental Protection Agency ("the agencies") hereby approve the Final Phase I RFI/RI Work Plan for Operable Unit No. 8, dated December 1, 1992:

In granting this approval; DOE is required to adhere to the "Data Aggregation for Human Health Exposure Assessment" attached to correspondence dated April 6, 1994. This letter from the agencies received DOE's concurrence.

The data aggregation protocol includes the methodology for the "Conservative Risk Screen for Sources at the Rocky Flats Plant" which must be based upon a residential exposure Risk Based Concentration (RBC). The RBC must be calculated assuming direct ingestion, inhalation and dermal contact to residential receptors equivalent to  $1 \times 10^{-6}$  carcinogenic risk and 1.0 hazard quotient (See the "Conservative Risk Screen" Flowchart). Application of an industrial/commercial or ecological worker RBC relative to the conservative risk screen will not be accepted in the Phase I RFI/RI Report.

It is our position that data aggregation protocols set forth in the April 6, 1994 letter are applicable to all operable units at the RFETS not merely Operable Unit 2-7 for which work was stopped pending resolution of the issue.

In addition, the agencies do not support NAI probe screening of the Central Avenue spill (IHSS 172) as an initial data collection effort. The NAI probe is not designed to detect radionuclides beneath, or within, pavement that may remain from the spill. Therefore, DOE is required to conduct surficial soil sampling and asphalt sampling as appropriate, to adequately investigate the IHSS. As negotiated this effort may be targeted to probable locations and materials to minimize cost schedule impacts and traffic problems on Central Avenue and connecting streets. As further agreed, the Division and EPA representatives will review the historical evidence of the spill and assist DOE in selecting appropriate sampling locations and materials. The sampling locations and protocols will then be included in the revision to Technical Memorandum (TM) No. 1 or a separate TM at DOE's discretion.

ES. CONTROL X X  
MIN RECORD/080  
TS/T130G

Reviewed for Addressee  
Corres. Control RFP

10-12-94  
DATE BY

Ref Ltr. #

DOE ORDER # 5400.1

ADMIN RECORD

A-OU08-000117

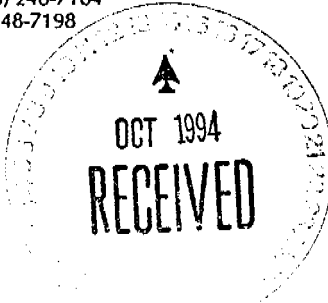
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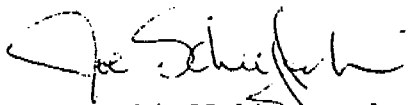
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Colorado Department of Public Health and Environment

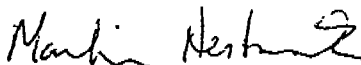


Please contact Harlen Ainscough at 692-3337 and Bill Fraser at 294-1081 to coordinate efforts relative to the Central Avenue sampling requirements.

Sincerely,



Joe Schieffelin, Leader  
Rocky Flats Unit  
Hazardous Waste Control Program  
Colorado Department of  
Public Health and Environment



Martin Hestmark, Manager  
Rocky Flats Project  
U. S. Environmental Protection Agency

cc: Daniel S. Miller, AGO  
Steve Tarlton, CDH-OE  
Fraser Lockhart, DOE  
Regina Sarter, DOE  
Bruce Peterman, EG&G  
Wayne Fuller, EG&G